

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

VELVIA WRIGHT

Plaintiff,

v.

CIVIL ACTION NO

FRONTLINE ASSET STRATEGIES, LLC

Defendant.

FEBRUARY 25, 2010

COMPLAINT

1. Plaintiff seeks relief pursuant to the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692; Md. Ann. Code Commercial Law Maryland Consumer Debt Collection Act. § 14-204 et seq. ("MCDCA"); and the Md. Ann. Code Commercial Law Consumer Practices Act § 13-301 et seq.
2. The Court's jurisdiction is conferred by 15 U.S.C. 1692k and 28 U.S.C. 1331 and 1367.
3. Plaintiff is a natural person who resides in Baltimore, MD.
4. Plaintiff is a consumer within the FDCPA.
5. Defendant is a debt collector within the FDCPA.
6. Defendant is a collector within the MCDCA.
7. Defendant is a foreign corporation engaged in the business of collecting debts in the State of Maryland with a principal place of business located at 1935 WEST

COUNTY ROAD B2, SUITE 425, ROSEVILLE, MN 55113 and is authorized to do collections in Maryland.

8. The principal purpose of Defendant business is the collection of debts and Defendant regularly attempts to collect debts alleged to be due another.

9. Defendant communicated with Plaintiff or others on or after one year before the date of this action, in connection with collection efforts with regard to Plaintiff's disputed personal debt.

10. The Plaintiff contacted the Defendant via telephone in an attempt to dispute a debt alleged by Defendant to be owed by Plaintiff.

11. The Defendant advised Plaintiff that she had no right to dispute the alleged debt owed. This statement is false misleading and deceptive in violation of §1692e and §1692g.

12. Defendant failed to advise the Plaintiff of the required notice pursuant to §1692 e(11).

13. Defendant through its agent who identified himself as Michael Goldman continued to contact the Plaintiff at her place of employment, despite being advised to cease and desist all contacts at work, in violation of the FDCPA prohibition in §1692c (a)(3).

14. Defendant failed to advise the Plaintiff of her rights pursuant to §1692g "Validation of Debts Clause."
15. In the collection efforts, the Defendant violated the FDCPA; inter alia, section 1692 e, f and g.

SECOND COUNT:

16. The allegations of the First Count are repeated and realleged as if fully set forth herein.

17. Within three years prior to the date of this action Defendant has engaged in acts and practices as to Plaintiff in violation of the Md. Ann. Code Commercial Law Maryland Consumer Debt Collection Act § 14-204 et seq. ("MCDCA").

18. Defendant has committed unfair or deceptive acts or practices within the meaning of the Md. Ann. Code Commercial Law Consumer Practices Act § 13-301 et seq.

WHEREFORE Plaintiff respectfully requests this Court to:

1. Award Plaintiff statutory damages pursuant to the FDCPA;
2. Award Plaintiff costs of suit and a reasonable attorney's fee.
3. Award such other and further relief as this Court may see fit.

THE PLAINTIFF

BY _____

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